

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

IN RE:	GARY D. HUGHES MANYA R. HUGHES Debtors))))	CHAPTER 7 CASE NO. 18-70236
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MOTION FOR COMPROMISE

COMES NOW the Trustee, by counsel, for his Motion for Compromise and states as follows:

1. The debtor, Manya R. Hughes, and her father, Markus Reich, conveyed a 0.6 acre parcel of realty known as 1756 Lee Hwy, Bristol, Virginia 24201 bearing City of Bristol, Virginia tax map number 3 13 10 to Manya R. Hughes' daughter, Nataalka C. Crosby, by deed dated July 21, 2017, and recorded on July 28, 2017 in the Clerk's Office of the City of Bristol, Virginia as Instrument Number 170001374 for no consideration received by the debtor, Manya R. Hughes, from Nataalka C. Crosby. The subject realty has a tax assessed value of \$100,300.00 by the City of Bristol, Virginia.
2. The Trustee has received a compromise offer from the debtors in the amount of \$19,105.91 in exchange for the Trustee's release of any claim against that same realty, and which will be paid in full and deposited in the bankruptcy estate account pending further Order from the U.S. Bankruptcy Court. This is a fair compromise in consideration of Manya R. Hughes' half-interest in the real estate at the time of the preferential transfer. Considering the costs of sale of realty, including paying a realtor commission and

expenses; Trustee sale commission and expenses; and litigation costs and litigation risks in any adversary proceeding if the Trustee were to administer the realty, the Trustee considers the offer to be appropriate and to be in the best of interest of joint unsecured creditors of Gary Hughes and Manya Hughes and those of Manya Hughes alone.

WHEREFORE, the Trustee asks the Court to approve the payment in the amount of \$19,105.91 to the Trustee in exchange for the Trustee's release and abandonment of any claim by the Trustee against the subject realty; and to grant such further relief as the Court may deem appropriate.

NOTICE OF HEARING

PLEASE TAKE NOTICE that a hearing on the Motion for Compromise will be heard by the United States Bankruptcy Court for the Western District of Virginia, Roanoke Division, on **January 3, 2019 at 10:30 a.m.**, or as soon thereafter as practical. The hearing will occur in the **U.S. Bankruptcy Court, 180 W. Main Street, Abingdon, VA 24210.**

TAKE FURTHER NOTICE that if any creditor objects to the relief requested in the attached Motion for Compromise, said objection shall be filed with the Clerk of the United States Bankruptcy Court, 210 Church Avenue, S.W., 2nd Floor, Roanoke, Virginia 24011, and with the undersigned Trustee by **January 1, 2019**. If no such objections are filed, the Trustee will ask the Court to enter an Order granting the relief requested without further notice or hearing, and will cancel the above hearing.

Any party having any questions concerning this matter, should contact the

undersigned Trustee during normal business hours.

Respectfully,

/s/ Scot S. Farthing

Scot S. Farthing, Trustee for the Debtors

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Chapter 7 Trustee for Debtors

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Compromise and Notice of Hearing were mailed and/or electronically transmitted to the debtors, debtors' counsel, John Lamie, Esquire, Nataalka C. Crosby, all creditors and the U.S. Trustee, this 11th day of December, 2018.

/s/ Scot S. Farthing

Scot S. Farthing, Trustee